

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

MILLENNIUM FUNDING, INC., *et al.*,

Plaintiffs,

v.

SURFSHARK LTD., *et al.*,

Defendants.

No. 1:21-CV-00643 RDA/IDD

DEFENDANT ZENGUARD GMBH'S MOTION TO STRIKE

Defendant ZenGuard GmbH (“ZenGuard”), by and through undersigned counsel, respectfully submits this Motion to Strike paragraphs 84–87 and 89–97 of the First Amended Complaint, pursuant to Rule 12(f) of the Federal Rules of Civil Procedure. A memorandum in support of this motion is submitted herewith.

Respectfully Submitted,

ZENGUARD GMBH

Dated: December 16, 2021

By: /s/ Gary M. Hnath

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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of December, 2021, the foregoing was electronically filed and served on all counsel through the Court's CM/ECF system, in accordance with the Court's electronic case filing policies and procedures.

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